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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ROBERT COACHE, an Individual,

Case No.: 2:21-cv-01334-RFB-BNW

11 Plaintiff,

12 vs.

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO FILE
RESPONSES TO MOTIONS TO DISMISS
[ECF NOS. 61 and 62]**

(Second Request)

13 MARC DIGIACOMO, an individual and an
employee of a government entity; COLIN
14 HAYNES, an individual and an employee of a
government entity; NATHAN CHIO, an
individual and an employee of a government
15 entity; and DOES 1-30,

16 Defendants.

17
18 Defendants, Colin Haynes and Lt. Nathan Chio (“LVMPD Defendants”), by and through
19 their counsel Kaempfer Crowell, Defendant Marc DiGiacomo, by and through his counsel
20 Deputy District Attorney, Scott Davis, and Plaintiff, Robert Coache, by and through his counsel
21 Ralph Schwartz from Ralph Schwartz, PC and Edwin Brown from Brown Clark Le Ames
22 Stedman & Cevallos LLP, hereby respectfully submit this Stipulation, Request and Order
23 Extending Time to File Responses to Motions to Dismiss. This is the second request for an
24 extension of time to respond to the Motions to Dismiss.

1 The LVMPD Defendants and DiGiacomo were served with Plaintiff's Amended
 2 Complaint on November 1, 2022. In response, DiGiacomo filed a Motion to Dismiss on
 3 November 29, 2022, [ECF No. 61] and the LVMPD Defendants filed a Motion to Dismiss on
 4 that same day also, [ECF No. 62]. The instant extension is requested as the Plaintiff's Counsel
 5 requires additional time to prepare responses to both Motions to Dismiss due to the holiday
 6 season.

7 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
 8 respectfully requests this Court grant an extension of time, up to and including January 3, 2023,
 9 for Plaintiff to file responses to the Motions to Dismiss, [ECF Nos. 61 and 62]. In addition, the
 10 LVMPD Defendants and Di Giacomo, likewise, respectfully request that the time to file their
 11 respective reply briefs be extended up to and including January 23, 2023.

12 DATED this 20th day of December, 2022.

13 RALPH A. SCHWARTZ, PC

KAEMPFER CROWELL

14 /s/ Edwin B. Brown

/s/ Lyssa S. Anderson

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1 CLARK COUNTY DISTRICT ATTORNEY

2 /s/ Scott Davis

3 STEVEN B. WOLFSON

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7 *Attorneys for Marc DiGiacomo*

10 **ORDER**

11 IT IS SO ORDERED.

12
13 
14 **RICHARD E. BOULWARE, II**
15 **United States District Court**
16 DATED this 27th day of December, 2022.